

THE CITY OF NEW YORK
LAW DEPARTMENT

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August 7, 2007

BY FAX (212) 805-7912

Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Nelson v. City of New York, et al.
07 CV 6485 (JGK) (GWG)

APPLICATION GRANTED.
SO ORDERED.

Wood
USDJ - PARTONE

Your Honor:

I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, attorney in the Office of the Corporation Counsel. I write to respectfully request an enlargement of time from August 7, 2007 to October 9, 2007 for the City of New York to answer or otherwise respond to plaintiff's complaint.¹ Plaintiff's counsel, Izavel Garcia, Esq., has agreed to the enlargement of time.

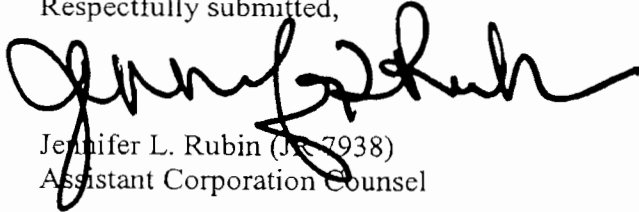
In accordance with this office's obligation under Rule 11 of the Federal Rules of Civil Procedure, we need time to investigate the allegations of the complaint. In this case, plaintiff alleges that she was falsely arrested by members of the New York City Police Department on or about March 27, 2006. Accordingly, it is necessary for defendant City of New York to acquire as much information as possible concerning this matter in order to properly assess the case and respond to the complaint. To that end, this office is in the process of forwarding to plaintiff for execution a N.Y.C.P.L. § 160.50 release so that we can access the sealed records from her underlying criminal prosecution.

Accordingly, defendant City respectfully requests that its time to respond to the complaint be extended to October 8, 2007.

¹ The two individually named defendants have not been served in this matter. However, according to Ms. Garcia, she expects that the two individually named defendants will be served shortly by summons and waiver of service.

Thank you for your consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jennifer L. Rubin". The signature is fluid and cursive, with a large initial "J" and "R".

Jennifer L. Rubin (JC 7938)
Assistant Corporation Counsel

cc: Izabel Garcia, Esq. (By Fax)
(718) 624-4748